



Gannett Fleming

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**VIA CERTIFIED MAIL**  
**# 7099 3400 0001 4745 4933**  
**RETURN RECEIPT REQUESTED**

August 3, 2000  
File #35221.001

Mr. Frank Faranca  
Case Manager  
New Jersey Department of Environmental Protection  
Division of Responsible Party Site Remediation  
Bureau of Federal Case Management  
401 East State Street, 5th Floor  
CN 028  
Trenton, New Jersey 08625-0028

Re: Lenox China Facility  
Pomona, New Jersey  
Response To NJDEP July 10, 2000 Comment Letter

Dear Mr. Faranca:

On behalf of Lenox China (Lenox), this letter responds to NJDEP's July 10, 2000 letter regarding the Department's review of the groundwater modeling and residential well data provided in the May 19, 2000 letter from Gannett Fleming to NJDEP.

The Department's letter requested that Lenox specifically identify the residences and businesses immediately downgradient of the Lenox facility that are served by public water, and that it clarify the proposed TCE groundwater remediation system pumping rate that will be used to control the TCE plume. With respect to the downgradient residences and businesses, the attached Figure shows the location of these establishments relative to the Mannheim Avenue and White Horse Pike intersection. The following establishments are served by public water:

Residences

O'Gram; Breder/Bieniakowski; Flaig; Morgenweck; Parker; Kirby; Shinn; Bellino; and Steele.

Businesses

Tres Figlio Restaurant; and Star Motel.

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Frank Faranca  
New Jersey Department of  
Environmental Protection  
August 3, 2000

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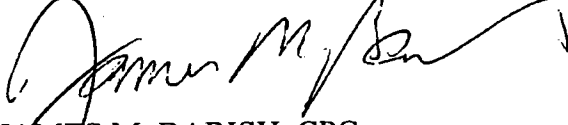
With respect to the proposed TCE recovery system pumping rate discussed in the May 19<sup>th</sup> letter to NJDEP, the groundwater modeling results indicated that an average pumping rate of 31 gallons per minute (gpm) per well would be necessary to provide adequate capture of the TCE plume. Lenox does not intend to set the system pumping rate at 31 gpm per well. Rather, it will use this value as a minimum threshold for maintaining plume capture. As you know, Lenox rehabilitated the remediation system in May of this year. After this work was completed, the average system pumping rate has been on the order of 38 to 40 gpm per well.

Lenox considers an Average Daily Volume of approximately 38 gpm per well as a realistic goal under normal operating conditions and absent any significant system outages or upsets. Even if a significant outage does occur, Lenox believes that it can perform the required repairs within the time necessary to achieve the minimum Average Daily Volume for that particular month. As indicated in the May 19<sup>th</sup> letter, it is our opinion that the model prediction of 31 gpm is a conservative estimate. The empirical database established over the past several years has shown that the shape and extent of the plume has remained virtually unchanged even though the actual volume of groundwater extracted daily by the recovery system since about 1996 has, on average, been less than the 31 gpm per well.

Please call John Kinkela at Lenox (609) 965-8272 or me if you have any questions or require additional information.

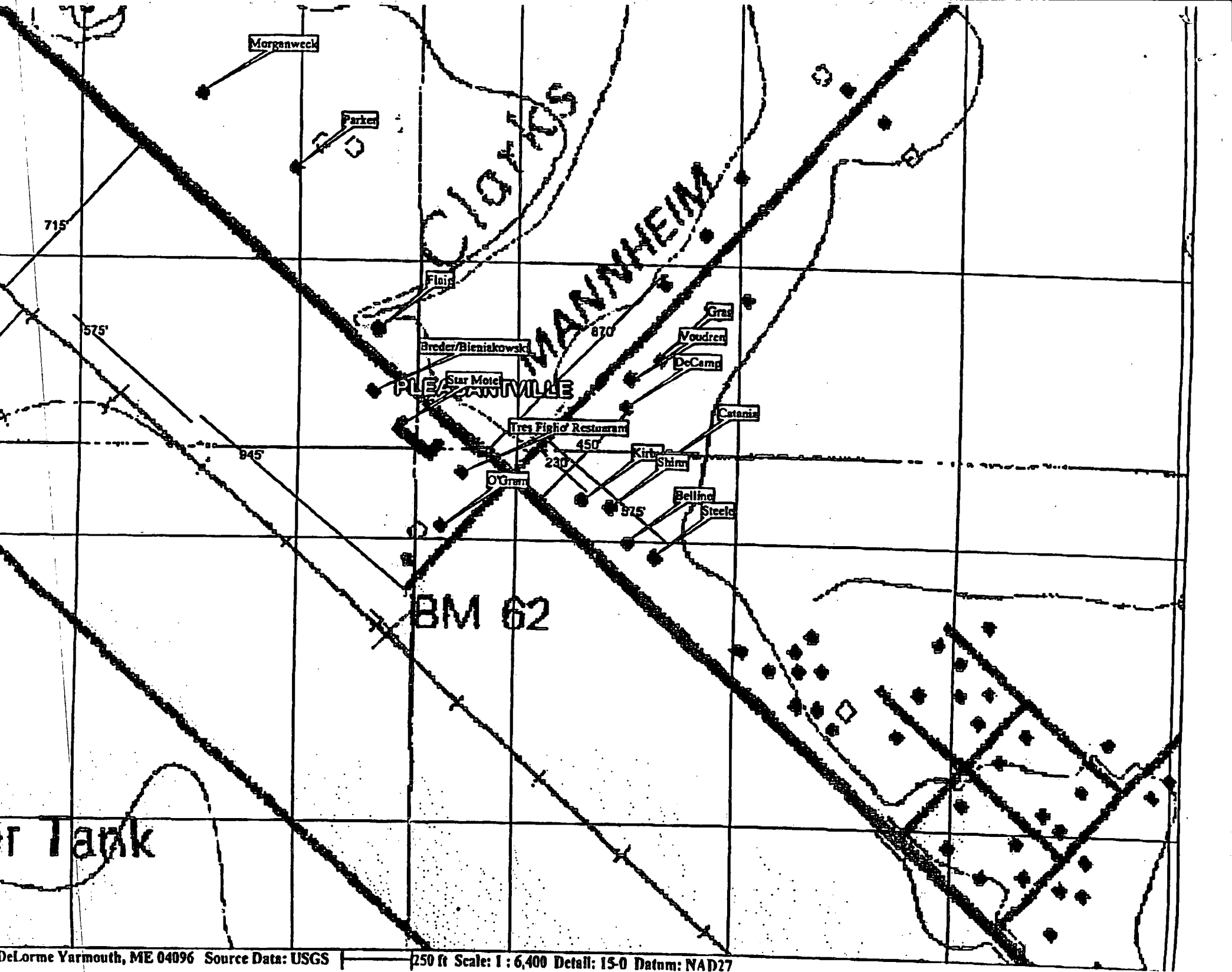
Very truly yours,

GANNETT FLEMING, INC.



JAMES M. BARISH, CPG  
Project Manager/Senior Hydrogeologist

cc: L. Fantin  
A. Park  
D. Clark  
J. Kinkela  
G. Berman  
R. Gan



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From James M. Barish, CPG  
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Project Manager Signature 